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September 29, 2023

Via ECF

The Honorable Laura Taylor Swain
United States District Court Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007-1312

**Re: Universitas Educ., LLC v. Nova Group, INC., et al,
Case Nos. 1:11-cv-01590, 1:11-cv-08726 (LTS)**

Dear Chief Judge Swain:

We represent Judgment Debtor Avon Capital, LLC (“Avon”). We are writing with regard to Avon’s motion brought pursuant to Fed. R. Civ. P. 60(b)(5), on the consent of plaintiff Universitas Education, LLC (“Universitas”), to request a 10-day extension of the October 3, 2023, deadline to October 13, 2023.

Counsel’s obligations related to a major court proceeding in another client matter, as well as counsel’s unavailability due to business travel, have necessitated this request for additional time for Avon to submit its reply brief in further support of its motion.

This extension will not affect any other deadline in this case or result in procedural delay. The undersigned has conferred with Joseph Manson, Esq., counsel for Universitas, who has consented to the extension. This is Avon’s first request concerning this motion.

We thank the Court for its time and consideration of this request.

Very truly yours,

/s/ Jeffrey M. Sklarz

Jeffrey M. Sklarz

cc: All Counsel of Record via ECF